

1 The Honorable Benjamin Settle  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

9 CLYDE RAY SPENCER, MATTHEW  
10 RAY SPENCER, and KATHRYN E.  
11 TETZ,

12 Plaintiffs,

13 vs.

14 FORMER DEPUTY PROSECUTING  
15 ATTORNEY FOR CLARK COUNTY  
16 JAMES M. PETERS, DETECTIVE  
17 SHARON KRAUSE, SERGEANT  
18 MICHAEL DAVIDSON, CLARK  
19 COUNTY PROSECUTOR'S OFFICE,  
CLARK COUNTY SHERIFF'S OFFICE,  
THE COUNTY OF CLARK, SHIRLEY  
SPENCER and JOHN DOES ONE  
THROUGH TEN,

20 Defendants.

21 No. C11-5424BHS

22 DEFENDANT SHIRLEY SPENCER'S  
ANSWER TO PLAINTIFFS'  
COMPLAINT

23  
DEFENDANT SPENCER'S ANSWER TO  
COMPLAINT [C11-5424BHS] - I  
lw/GAW1218.466/851993

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1 COMES NOW defendant Shirley Spencer, by her attorneys of record, Gary  
2 A. Western and William H. Dunn, and in answer to the plaintiffs' complaint states  
3 as follows:

4 Plaintiffs' complaint violates F.R.C.P. 8(a)(2), which requires that a claim  
5 for relief filed in court contain a "short and plain statement of the claim showing  
6 that the pleader is entitled to relief." Plaintiffs' complaint is argumentative,  
7 includes legal conclusions, and has a narrative of events dating back more than 60  
8 years, many of which are irrelevant to this claim. Defendant objects to the  
9 language of the complaint and all allegations are denied unless specifically  
10 admitted herein.

12 **PARAGRAPHS ADMITTED IN PART AND DENIED IN PART**

13 Answering Paragraph 1, defendant admits that plaintiffs' complaint alleges  
14 claims under 42 U.S.C. § 1983 and state law, but denies the remaining allegations.

15 Answering Paragraph 3, admit this court has jurisdiction over plaintiffs'  
16 federal causes of action but denies the remaining allegations.

17 Answering Paragraph 5, to the extent that the allegations contained in this  
18 paragraph contain legal conclusions, they are denied. Admit that plaintiff was  
19 allowed to withdraw his plea of guilty following the conclusion of a personal  
20 restraint petition filed in the appellate courts of the State of Washington. Deny  
21 the remaining allegations as they are legal conclusions.

1 Answering Paragraph 11, admit that the Clark County Prosecutor's Office is  
2 an agency of Clark County but deny the remaining allegations.

3 Answering Paragraph 14, admit that the Clark County Prosecutor's Office is  
4 an agency of Clark County, but deny the remaining allegations.

5 Answering Paragraph 36, admit the first two sentences and deny the  
6 allegations of the third sentence.

7 Answering Paragraph 37, admit they resided in Washington. All other  
8 allegations are denied.

9 Answering Paragraph 40, admit Ms. Spencer told plaintiff in a phone call  
10 about what Kathryn had reported. Plaintiff said "oh is that all, I'll take care of it  
11 when I get home." Ms. Spencer had called the Clark County Sheriff to report  
12 Kathryn's statements. Admit Kathryn said she had been touched by more than  
13 one person. Deny all other allegations.

14 Answering Paragraph 41, it was Ms. Spencer who first reported Kathryn's  
15 statements to the Clark County Sheriff's office. Ms. Spencer denies the remaining  
16 allegations due to a lack of information.

17 Answering Paragraph 62, admit that after plaintiff pled guilty, Ms. Spencer  
18 and Mr. Davidson began a relationship. All other allegations are denied.

19 Answering Paragraph 64, admit they did not have a relationship until after  
20 plaintiff pled guilty. All other allegations are denied.

1 Answering Paragraph 67, admit that at some point Ms. Spencer sold her  
2 house, which she owned before meeting the plaintiff, for \$5,000. Admit she  
3 moved into a different house. Deny all other allegations.

4 Answering Paragraph 169, admit that after plaintiff pled guilty, Ms. Spencer  
5 began a relationship with Mr. Davidson. All other allegations are denied.  
6

7 Answering Paragraph 213, admit plaintiff's Petition was denied. All other  
8 allegations are denied.  
9

10 Answering Paragraph 226, admit that Ms. Spencer and Mr. Davidson began  
11 a relationship after plaintiff pled guilty. All other allegations are denied.  
12

13 **PARAGRAPH ADMITTED IN PART AND DENIED ON  
14 INFORMATION AND BELIEF IN PART**

15 Answering Paragraph 86, admit that plaintiff was hospitalized at  
16 Oregon Health Science Center. As to the other allegations of this paragraph, this  
17 defendant lacks information sufficient to form a belief as to the truth thereof, and  
18 therefore denies the same.  
19

20 Answering Paragraph 108, admit the first sentence, admit she said Matt  
21 reported plaintiff abused him with oral sex and anal penetration. Defendant lacks  
22 information as to the other allegation.  
23

24 **PARAGRAPHS ADMITTED**

25 Paragraphs 2, 4, 6, 7, 8, 9, 10, 12, 13, 15, 35, 39, 104, 105, 107, 167 and  
26 168 are admitted.  
27

1                   **PARAGRAPHS DENIED**

2                   Paragraphs 16, 38, 66, 106, 129, 130, 160, 209, 210, 211, 212, 257, 258,  
3 262, 263 and 286-394 are denied.

4                   **PARAGRAPHS DENIED ON INFORMATION AND BELIEF**

5                   Answering Paragraphs 17-34, 42-61, 63, 65, 68-85, 87-102, 109-128, 131-  
6 159, 161-166, 170-208, 214-225, 227-256, 259-261, 264-285, this defendant  
7 lacks information sufficient to form a belief as to the truth thereof, and therefore  
8 denies the same.

9                   **AFFIRMATIVE DEFENSES**

10                  1.       The plaintiffs' claims are barred by the doctrines of res judicata,  
11 collateral estoppel and judicial estoppel.

12                  2.       Some or all of the plaintiffs' claims are barred by the statute of  
13 limitations.

14                  3.       Some or all of the plaintiffs' claims are barred by the doctrine of  
15 laches.

16                  4.       The plaintiffs caused or contributed to their own damages, if any.

17                  5.       Plaintiffs' injuries and damages, if any, may have been caused by the  
18 intentional conduct of another party and those damages must be segregated from  
19 the damages caused by fault.

1       6. The injuries and damages, if any, claimed by the plaintiff Clyde Ray  
2 Spencer, arise out of a condition to which he had knowledge and voluntarily  
3 subjected himself.

4       7. The investigation, arrest and prosecution of Clyde Ray Spencer were  
5 undertaken with probable cause and were lawful.

6       8. The plaintiffs' damages, if any, were caused by the plaintiffs' failure  
7 to mitigate said damages.

9       9. Plaintiffs were comparatively negligent, and, consequently, plaintiffs'  
10 damages should be reduced in proportion to their own comparative fault.

11      10. The conduct of this defendant was privileged.

12      11. The plaintiffs' damages, if any, were caused by the acts or omission of  
13 third parties over whom this defendant had no control.

14      12. This defendant is entitled to immunity for all actions related to the  
15 prosecution of Mr. Spencer.

16      13. Ms. Spencer is immune from liability for her reports to the  
17 appropriate governmental bodies. RCW 4.24.500.

18      14. Plaintiffs' complaint fails to state a claim upon which relief can be  
19 granted.

20      21 15. The Section 1983 claim as to this defendant is frivolous and entitles  
22 this defendant to her attorney fees and expenses.

1 WHEREFORE, defendant prays for judgment:

2 1. Dismissing plaintiffs' complaint with prejudice and with costs;

3 2. Apportioning any damages according to the proportionate fault of all

4 persons or entities;

5 3. For all of defendant's attorney fees and costs incurred herein; and

6 4. For such further relief as the court deems just and equitable.

7 DATED this 15th day of December, 2011.

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing with the Clerk of the  
3 Court using the CM/ECF system which will send notification of such filing to the  
4 following:

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